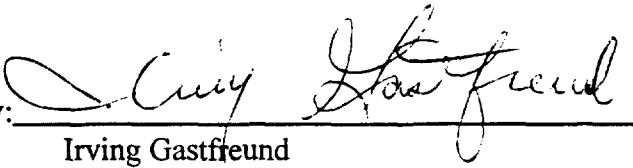


Allotments as set forth hereinabove.

Respectfully submitted,

U. S. BROADCASTING LIMITED PARTNERSHIP

By:   
Irving Gastfreund

Kaye, Scholer, Fierman, Hays & Handler, LLP  
901 15th Street, N.W., Suite 1100  
Washington, D.C. 20006  
(202) 682-3526  
Its Attorneys

November 19, 1997

**Exhibit 1**

*du Tre., Lundin & Rackley, Inc.*

\_\_\_\_\_ A Subsidiary of A.D. Ring, P.A.



ENGINEERING EXHIBIT IN SUPPORT OF  
PETITION FOR RULE MAKING OF  
U. S. BROADCASTING LIMITED PARTNERSHIP  
FOR REALLOTMENT OF  
FM BROADCAST STATION WPEZ  
FROM MACON, GA TO HAMPTON, GA

October 21, 1997



ENGINEERING EXHIBIT IN SUPPORT OF  
PETITION FOR RULE MAKING OF  
U. S. BROADCASTING LIMITED PARTNERSHIP  
FOR REALLOTMENT OF  
FM BROADCAST STATION WPEZ  
FROM MACON, GA TO HAMPTON, GA

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ENGINEERING EXHIBIT IN SUPPORT OF  
PETITION FOR RULE MAKING OF  
U. S. BROADCASTING LIMITED PARTNERSHIP  
FOR REALLOTMENT OF  
FM BROADCAST STATION WPEZ  
FROM MACON, GA TO HAMPTON, GA

Technical Statement

This Engineering Exhibit was prepared on behalf of U. S. Broadcasting Limited Partnership (herein "WPEZ"), licensee of FM broadcast station WPEZ Macon, Georgia. This Exhibit supports a petition for rule making to amend the FM table of allotments, 47 CFR 73.202(b) as follows:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Macon, GA	222A, 256C1 287C1, 300C1	222A, 256C1 287C1
Hampton, GA	- -	300C1

Station WPEZ operates on commercial FM channel 300C1, employing effective radiated power (ERP) of 100 kilowatts and antenna height above average terrain (HAAT) of 210 meters. The HAAT employed by WPEZ is 89 meters below the maximum permitted a class C1 FM station. The WPEZ proposal would remove a local service from Macon with abundant service, and provide another city - Hampton, GA - with its first and only local broadcast facility.



In addition to the allotment of four FM channels, all of which are currently in use, there are six AM broadcast stations licensed to Macon. Hampton, on the other hand, has no local aural broadcast assignment.

Hampton City is located in Henry County, Georgia, and according to the 1990 Census, the city had a population of 2,294 persons and the county had a population of 58,741. Hampton is not located in any urbanized area according to the 1990 Census data. The closest urbanized area to Hampton is the southern-most part of the Atlanta Urbanized area, approximately 8 kilometers to the north.

Channel 300C1 can be allotted to Hampton in compliance with the separation requirements of 47 CFR 73.207, employing a transmitter site located approximately 13 kilometers southwest of the city. The following geographic coordinates were employed as reference coordinates for the allocation study:

33° 15' 30" North Latitude

84° 26' 21" West Longitude.

Figure 2 attached lists all pertinent stations associated with the use of channel 300C1 at Hampton. The use of channel 300C1 at these reference coordinates fully complies with Federal Communications Commission rules regarding minimum separation with other pertinent stations, in



addition to the requisite coverage of Hampton. The allocation of channel 300C1 at Hampton, GA is mutually exclusive with the existing use of channel 300C1 by WPEZ.

Figure 3 is a map showing the area in which channel 300C1 may be located and meet all separation requirements as defined in 47 CFR 73.207. This sizable area contains 1,622 square kilometers. The reference geographic coordinates employed for study of channel 300C1 at Hampton are located in the northern part of the usable zone.

In addition to complying with FCC allocation and city coverage rules, the proposed WPEZ operation at Hampton covers no more than 17.8 percent of the Atlanta Urbanized Area (and no portion of any other urbanized area), as defined by the 1990 Census, with a signal strength of 70 dBu (3.16 mV/m) or greater. This assumes operation with maximum class C1 effective radiated power (100 kilowatts) and antenna height (299 meters) and with omni-directional antenna.

The proposed use of Channel 300C1 in Hampton results in greater than 70 dBu (3.16 mV/m) coverage of all of Hampton. In addition, the proposed WPEZ 60 dBu (1.0 mV/m) contour will provide a service to 1,994,701 persons in an area of 16,422 square kilometers. Coverage for the



operation of WPEZ in Hampton, as proposed, is based on the use of maximum Class C1 facilities.

Reallocation of Channel 300C1 to Hampton would bring to it a first local aural broadcast transmission facility. Conversely, after reallotment of WPEZ from Macon, Georgia to Hampton, Georgia, the city of Macon would still enjoy the local broadcast transmission service of each of the following: (a) WMKS (Channel 222A), WAYS (Channel 256C1) and WDEN (Channel 287C1); and (b) six local AM stations: WBML (900 kHz), WMWR (940 kHz), WDDO (1240 kHz), WIBB (1280 kHz), WNEX (1400 kHz) and WDEN (1500 kHz). Hence, after reallocation of WPEZ to Hampton, Macon would still continue to have at least nine local transmission services in that community and would continue to receive 1 mV/m service from at least 17 commercial radio stations (including the nine mentioned above).

The currently licensed facility of WPEZ (100 KW ERP, 210 meters HAAT) provides service to 438,179 persons in an area of 13,265 square kilometers. Five or more aural reception services would remain available within the entire existing 60 dBu (1 mV/m) contour of WPEZ, as shown on Figure 4.

The area and population (12,307 square kilometers and 403,028 persons) which are theoretically predicted to lose WPEZ service, each, receive five or more existing





reception services if signal strength of 60 dBu (1 mV/m) or greater as shown on Figure 4. A summary of population and area follows.

	<u>60 dBu contour</u>	
	<u>Population (1990)</u>	<u>Area (sq. km)</u>
Proposed WPEZ	1,994,701	16,422
Existing WPEZ	438,179	13,265
Common Coverage	35,151	958
Net Gain	1,959,550	15,464
Net Loss	403,028	12,307

In short, the proposed net gains clearly outweigh any net losses in service.

Figure 5 is a tabulation of the stations shown on Figure 4. For FM stations, 60 dBu (1.0 mV/m) contours are shown, and for AM stations, the 0.5 mV/m contours are shown. Data employed for these stations is from the FCC's computer database. For AM stations, conductivity from the Commission's M-3 map was assumed.

The proposed WPEZ operation at Hampton will provide that community with its first local transmission

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Hampton, Georgia

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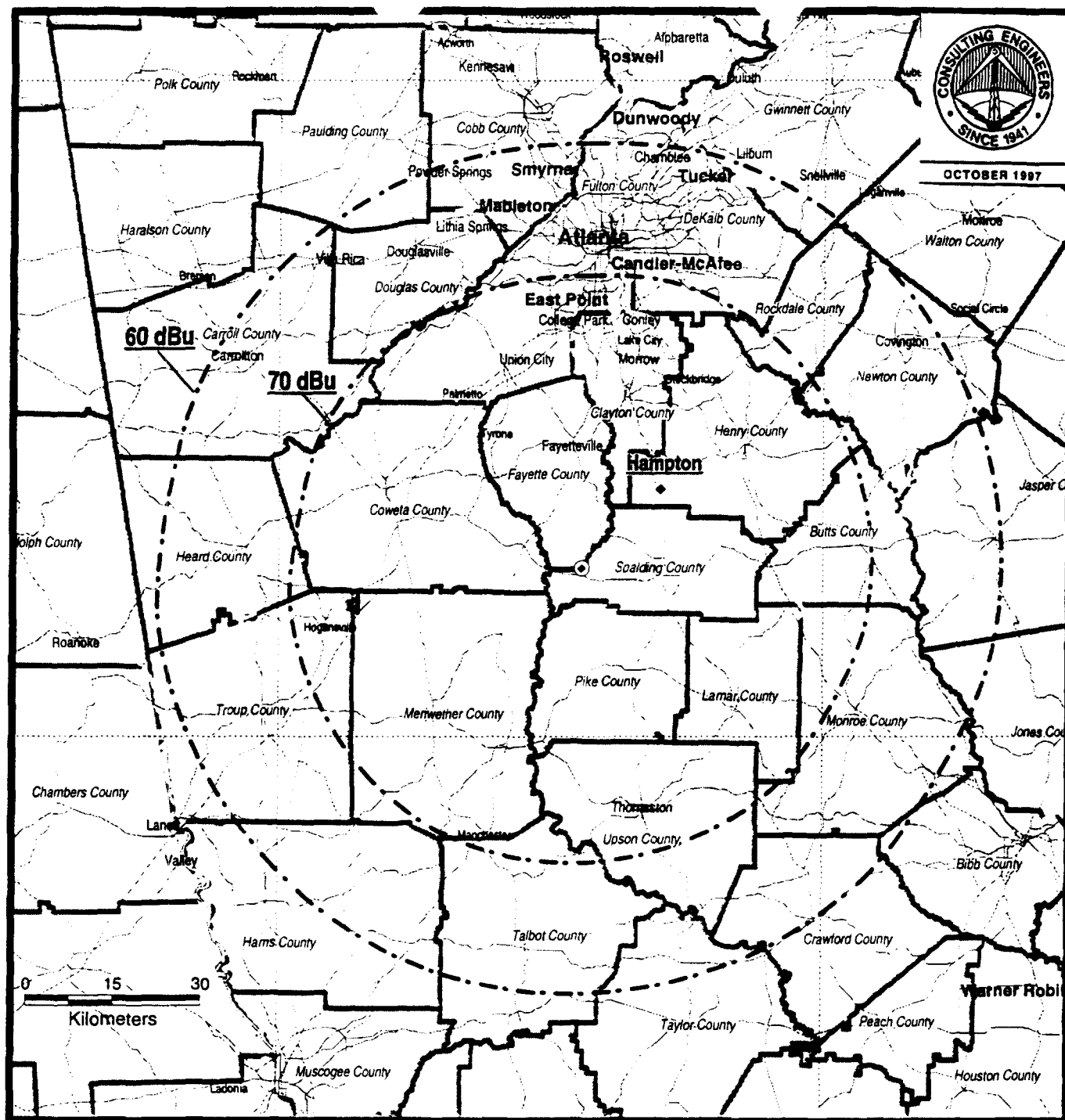
service without adverse impact on the existing city of  
license.

*Louis R. du Treil*

Louis R. du Treil, Sr.  
du Treil, Lundin & Rackley, Inc.  
240 North Washington Boulevard  
Suite 700  
Sarasota, FL 34236

(941) 366-2611  
October 21, 1997

Figure 1



**PROPOSED COVERAGE CONTOUR FOR  
WPEZ AT HAMPTON, GA**

**WPEZ  
HAMPTON, GEORGIA  
300 C1 100 kw 299m**

**du Treil, Lundin & Rackley, Inc. Sarasota, Florida**

Figure 2

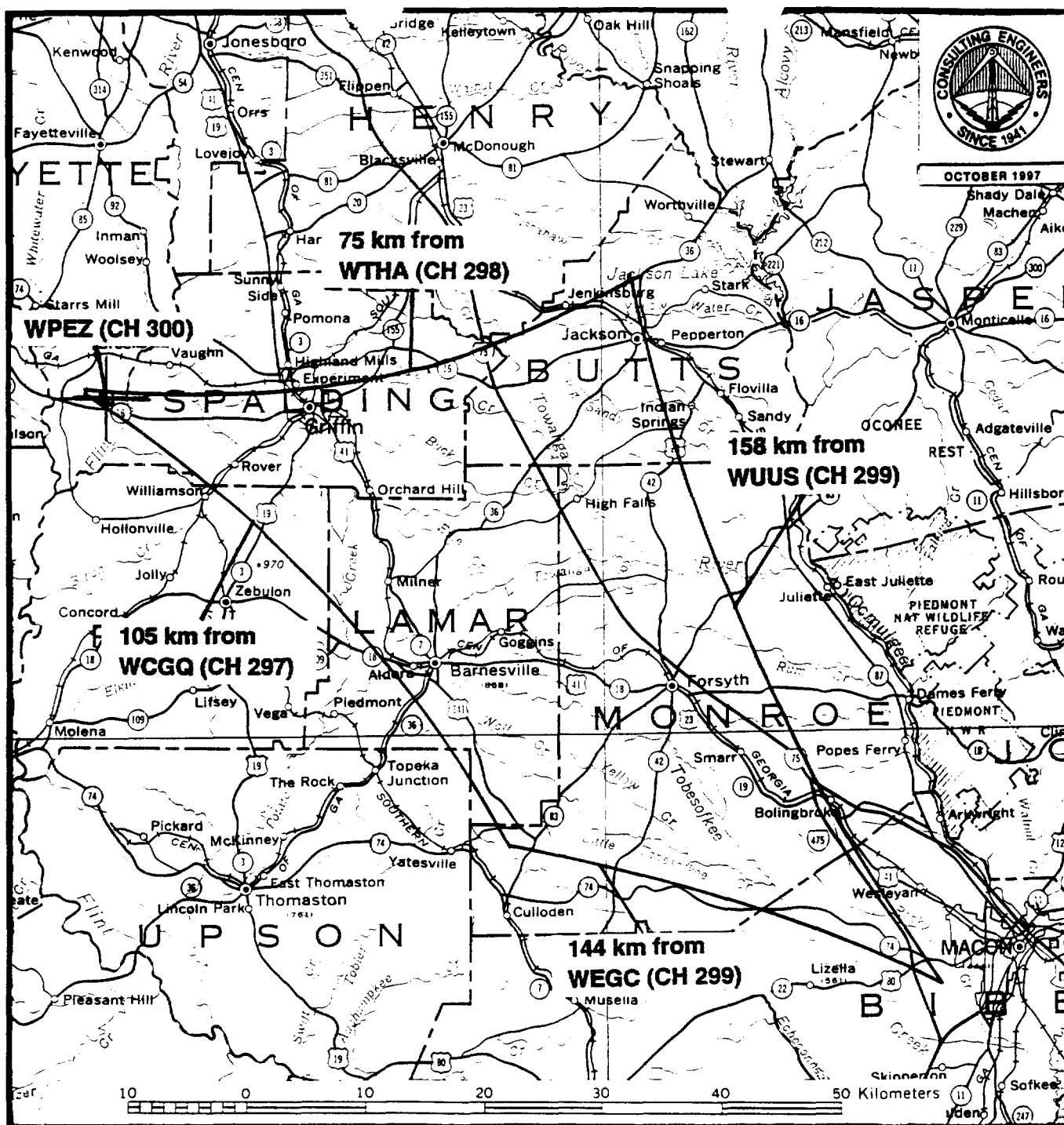
ENGINEERING EXHIBIT IN SUPPORT OF  
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 U. S. BROADCASTING LIMITED PARTNERSHIP  
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 FM BROADCAST STATION WPEZ  
 FROM MACON, GA TO HAMPTON, GA

FM Separation Study

Reference 33° 15' 30" North Latitude  
 Coordinates 84° 26' 21" West Longitude

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WCGQ LIC	Columbus GA	BLH861124KA	297C 107.3	100. 308.0	32-27-59 85-03-23	213.4	105.13 .13	105 CLOSE
WTHA CP	Roswell GA	BPH870727MF	298A 107.5	6.0 98.0	33-55-48 84-20-45	6.6	75.01 .01	75 CLOSE
WEGC LIC	Sasser GA	BLH950825KC	299C3 107.7	11.5 95.0	31-38-42 84-21-15	177.4 SS	179.09 35.09	144 CLEAR
WUUS LIC	Martinez GA		299C2 107.7	24.5 176.0	33-36-47 82-17-51	78.2 SS	203.01 45.01	158 Clear
WENNFM LIC	Birmingham AL	BLH910708KB	299C 107.7	100. 377.0	33-43-52 86-37-57	285.1	210.46 1.46	209 CLOSE
WPEZ LIC	Macon GA	BLH890221KA	300C1 107.9	100. 210.0	32-45-12 83-33-46	124.3	99.23 -145.77	245 SHORT
WOGT LIC	East Ridge TN	BLH931101KZ	300C3 107.9	2.85DA 295.0	35-09-42 85-19-06	339.3 SS	226.14 15.14	211 CLOSE

Figure 3



**AREA IN WHICH TO LOCATE FM CHANNEL 300 C1**

**WPEZ**  
**HAMPTON, GEORGIA**  
**300 C1 100 kw 299m**

**du Treil, Lundin & Rackley, Inc. Sarasota, Florida**



ENGINEERING EXHIBIT IN SUPPORT OF  
PETITION FOR RULE MAKING OF  
U. S. BROADCASTING LIMITED PARTNERSHIP  
FOR REALLOTMENT OF  
FM BROADCAST STATION WPEZ  
FROM MACON, GA TO HAMPTON, GA

Tabulation of Other Services

I. FM Stations

Map No.	Call Letters	Location (GA)	Channel
1	WFXM-FM	Forsyth	261A
2	WNML-FM	Gray	243C3
3	WJGA-FM	Jackson	221A
4	WEKS	Zebulon	223A
5	WQBZ	Fort Valley	292C2
6	WTGA-FM	Thomas	226A
7	WMKS	Macon	222A
8	WDEN-FM	Macon	287C1
9	WMGB	Jeffersonville	229C2
10	WAYS	Macon	256C1
11	WRBV	Warner Robins	269A
12	WIBB-FM	Fort Valley	250C3
13	WPGA-FM	Perry	265A
14	WLCG-FM	Warner Robins	273A
15	WVFJ-FM	Manchester	227C
16	WKZJ	Greenville	239C3
17	WKZR	Gordon	296A
18	WKZR	Milledgeville	272A
19	WLRR	Milledgeville	264A
20	WHTA	Fayetteville	248C3
21	WVKX	Irwinton	279A
22	WAFI	Unadilla	260A
23	WMKJ	Peachtree City	244A
24	WVMG-FM	Cochran	244A
25	WZLG	Hogansville	251C3
26	WSTR	Smyrna	231C
27	WSB-FM	Atlanta	253C
28	WVEE	Atlanta	277C
29	WJZF	La Grange	281C1
30	WZGC	Atlanta	225C1
31	WNNX	Atlanta	259C

32	WPCH	Atlanta	235C
33	WKLS	Atlanta	241C
34	WKHX-FM	Marietta	268C
35	WALR-FM	Athens	284C1
36	WQSY	Hawkinsville	280C3
Map No.	Call Letters	Location (GA)	Channel
37	WISK-FM	Americus	254C3
38	WVRK	Columbus	275C
39	WGSY	West Point	265A
40	WUFF-FM	Eastman	248A
41	WBTR-FM	Carrollton	221A
42	WRLD-FM	Valley	237A
43	WCGQ	Columbus	297C
44	WKKZ	Dublin	224C2
45	WFOX	Gainsville	246C
46	WYAY	Gainsville	294C
47	WDEC-FM	Americus	234C3
48	WNGC	Athens	238C
49	WQZY	Dublin	240C1

## II. AM Stations

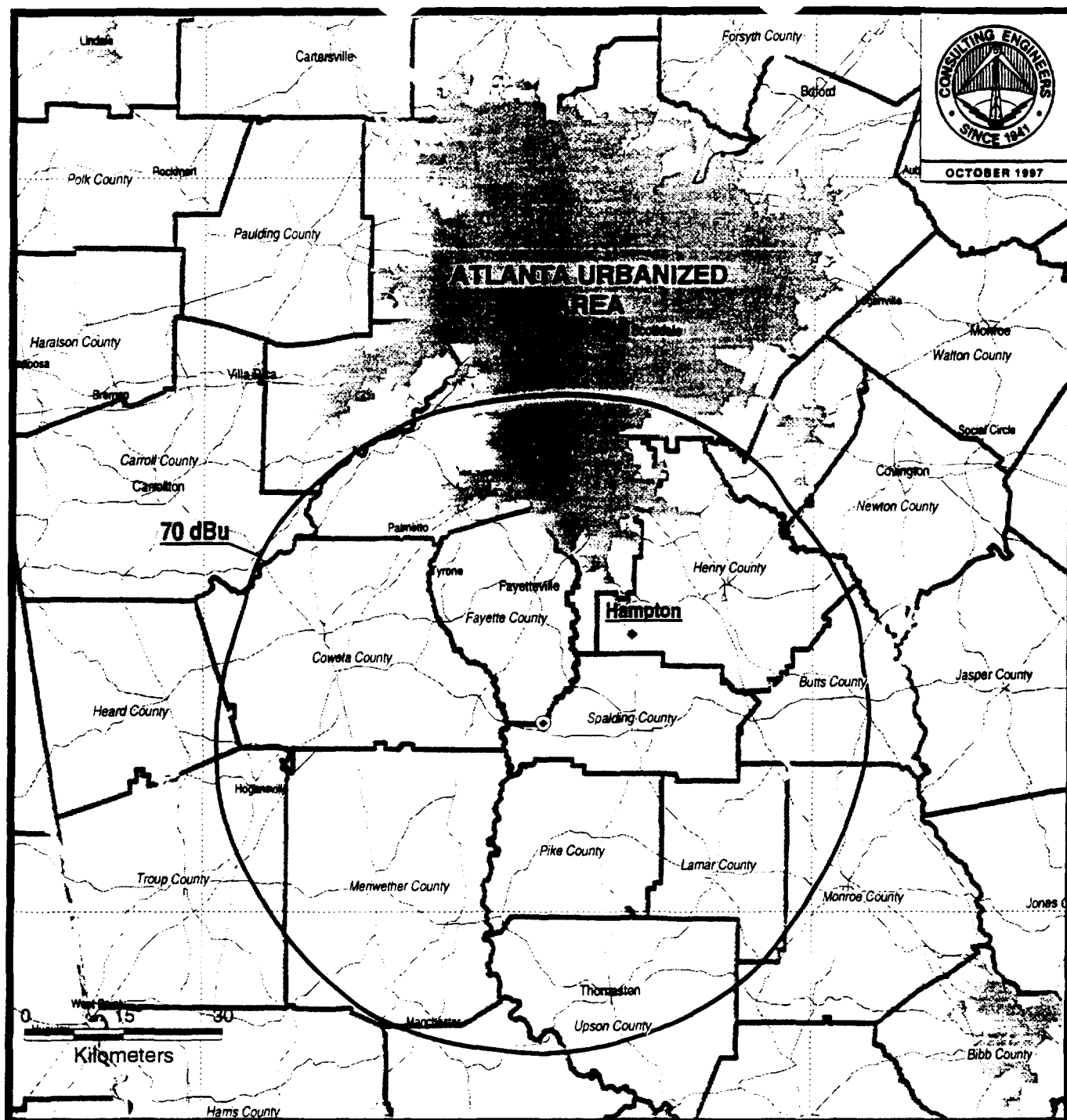
Map No.	Call Letters	Location (GA)	Frequency (kHz)
101	WBAF	Barnsville	1090
102	WMWR	Macon	940
103	WTGA	Thomaston	1590
104	WKEU	Griffin	1450
105	WNEX	Macon	1400
106	WDDO	Macon	1240
107	WHIE	Griffin	1320
108	WDEN	Macon	1500
109	WBML	Macon	900
110	WIBB	Macon	1280
111	WXKO	Fort Valley	1150
112	WKKP	McDonough	1410
113	WBNM	Gordon	1120
114	WNML	Warner Robins	1600
115	WCOP	Warner Robins	1350
116	WFDR	Manchester	1370
117	WKVQ	Eatonton	1520



118	WPGA	Perry	980
119	WGFS	Covington	1430
120	WMVG	Milledgeville	1450
121	WSSA	Morrow	1570
122	WPBS	Conyers	1050
123	WKGQ	Milledgeville	1060
124	WMNZ	Montezuma	1050
125	WYTH	Madison	1250
126	WGUN	Atlanta	1010
127	WNEA	Newnan	1300
128	WCOH	Newnan	1400
129	WAEC	Atlanta	860
Map No.	Call Letters	Location (GA)	Frequency (kHz)
130	WYZE	Atlanta	1480
131	WERD	East Point	1160
132	WVMG	Cochran	1440
133	WTJH	East Point	1260
134	WMXY	Hogansville	720
135	WXLL	Decatur	1310
136	WATB	Decatur	1420
137	WALR	Atlanta	1340
138	WKUN	Monroe	1580
139	WGST	Atlanta	640
140	WCEH	Hawkinsville	610
141	WAOK	Atlanta	1380
142	WNIV	Atlanta	970
143	WGKA	Atlanta	1190
144	WAFS	Atlanta	920
145	WQXI	Atlanta	790
146	WLAG	La Grange	1240
147	WTRP	La Grange	620
148	WSB	Atlanta	750
149	WWWN	Vienna	1550
150	WISK	Americus	1390
151	WPLO	Grayson	610
152	WAOS	Austell	1600
153	WPLV	West Point	1310
154	WPNX	Phenix City, AL	1460
155	WDCY	Douglasville	1520
156	WCNN	North Atlanta	680
157	WOKS	Columbus	1340
158	WAZX	Smyrna	1550
159	WDWD	Atlanta	590

160	WSNT	Sandersville	1490
161	WLBA	Powder Springs	1130
162	WUFF	Eastman	710
163	WRCG	Columbus	1420
164	WMLF	Columbus	1270
165	WXLI	Dublin	1230
166	WDAK	Columbus	540
167	WPPI	Carrollton	1330
168	WMLT	Dublin	1330
169	WVNF	Alpharetta	1400
170	WWWE	Carrollton	1100
171	WFTD	Marietta	1080
172	WELR	Roanoke, AL	1360
173	WGMI	Bremen	1440
174	WZMG	Pepperell, AL	910
175	WKNG	Tallapoosa	1060

Figure 6



**PROPOSED HAMPTON 70 dBu COVERAGE IN  
RELATION TO THE ATLANTA URBANIZED AREA**

**WPEZ  
HAMPTON, GEORGIA  
300 C1 100 kw 299m**

**du Treil, Lundin & Rackley, Inc. Sarasota, Florida**

**CERTIFICATE OF SERVICE**

I, Mary Odder, a secretary in the law firm of Kaye, Scholer, Fierman, Hays & Handler, LLP hereby certify that on this 19th day of November, 1997, have caused a copy of the foregoing Petition For Rulemaking to be hand-delivered, to the following:

John A. Karousos  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2000 M Street, N.W., Room 554  
Washington, D.C. 20554

Ms. Leslie K. Shapiro  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2000 M Street, N.W., Room 564  
Washington, D.C. 20554


  
\_\_\_\_\_  
Mary Odder

Exhibit 2

**Engineering Statement**



***du Treil, Lundin & Rackley, Inc.***

---

240 North Washington Blvd., Suite 700  
Sarasota, Florida 34236  
Telephone: (941) 366-2611  
Facsimile: (941) 366-5533

**MEMORANDUM**

DATE: April 7, 1998

TO: Irving Gastfreund, Esq.

FROM: Bob du Treil, Sr.

Attached is the original of our Engineering Statement in support of comments in the Notice of Proposed Rule Making MM Docket No. 98-18 for U.S. Broadcasting Limited Partnership.

Please call if you have questions.

Best wishes.

Copy: Doug Grimm

ENGINEERING STATEMENT  
IN SUPPORT OF COMMENTS IN  
NOTICE OF PROPOSED RULE MAKING  
MM DOCKET NO. 98-18  
RM-9204

This Engineering Statement, prepared on behalf of U. S. Broadcasting Limited Partnership, supports comments in the Notice Of Proposed Rule Making, MM Docket No. 98-18, RM-9204. The Rule Making, RM-9204, results from a request by U. S. Broadcasting to modify the license of Station WPEZ to specify Hampton, Georgia as its city of license.

In paragraph 4 of the NPRM, the FCC admonishes U. S. Broadcasting to have its proposal conform with the technical requirements of Section 73.1030(c)(1)-(5) of the Commission's Rules regarding protection to the Commission's monitoring station at Power Springs, Georgia. The rule requires all stations within 80 kilometers employing power of 25 kilowatts or more to consult with the Commission prior to filing of an application, particularly in the instance where there is no reliable propagation data. The rule further restricts the field strength at the monitoring station to a value of 10 mV/m or less.

Employing the geographic coordinates for the Powder Springs Monitor Station as listed in Section 0.121(c) of the Rules, the proposed WPEZ reference

coordinates are 72 kilometers distant. The FCC propagation curves of Section 73.333 indicate that for a full facility Class C1 station, consisting of 100 kilowatts effective radiated power and antenna height above average terrain of 299 meters, the predicted 10 mV/m contour will extend to a distance of 31.2 kilometers. This is less than one-half the distance from WPEZ to the monitoring station.

Based on engineering study, there is no likelihood of the proposed operation of WPEZ at Hampton, GA providing a signal of 10 mV/m or greater at the Powder Springs, GA monitoring station. However, when the actual facility is proposed in an application to the FCC, and the pertinent ground elevations from the proposed WPEZ operation to the monitoring station are known, U. S. Broadcasting will notify the Commission of the predicted field strength at the Powder Springs monitoring station.



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April 7, 1998